

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Pro Slab, Inc. et al.,

Plaintiffs,

v.

Argos North America Corp. et al.,

Defendants.

Civil Action No. 2:17-cv-3185-BHH

**INTERVENOR UNITED STATES' MOTION
TO EXTEND THE LIMITED STAY OF DISCOVERY**

Intervenor United States of America respectfully submits this motion to extend the limited stay of discovery through March 22, 2021, in order to protect the integrity of the United States' ongoing criminal investigations and litigation and to prevent interference with potential witnesses or evidence. In support of this motion, the United States submits the accompanying memorandum of law.

The United States has conferred with counsel for the parties. Plaintiffs have represented that they do not oppose this Motion provided that all other discovery, pre-trial, and trial deadlines and the trial date are also extended by an additional six months. Defendants have represented that they do not oppose this Motion and also do not oppose the Plaintiffs' condition regarding the six-month extension of all other discovery, pre-trial, and trial deadlines and the trial date. The United States takes no position regarding the existing deadlines or the trial date in this action.

Respectfully submitted this 16th day of September, 2020.

PETER M. MCCOY, JR.
United States Attorney

s/James C. Leventis, Jr.
JAMES C. LEVENTIS, Jr. (#9406)
Assistant United States Attorney
1441 Main St., Suite 500
Columbia, SC 29201
Tel: (803) 929-3000
James.Leventis@usdoj.gov

MATTHEW C. STEGMAN (admitted *pro hac vice*)
D.C. Bar No. 1015677
Trial Attorney
U.S. Department of Justice, Antitrust Division
450 5th Street NW
Washington, DC 20530
Email: matthew.stegman@usdoj.gov
Tel: (202) 598-8381
Fax: (202) 598-2428

PATRICK S. BROWN (admitted *pro hac vice*)
D.C. Bar No. 1028809
Trial Attorney
U.S. Department of Justice, Antitrust Division
450 5th Street NW
Washington, DC 20530
Email: patrick.brown2@usdoj.gov
Tel: (202) 307-0520
Fax: (202) 598-2428

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date electronically filed the foregoing Intervenor United States' Motion to Extend the Limited Stay of Discovery with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record for all parties to this action.

PETER M. MCCOY, JR.
United States Attorney

s/James C. Leventis, Jr.
JAMES C. LEVENTIS, Jr. (#9406)
Assistant United States Attorney
1441 Main St., Suite 500
Columbia, SC 29201
Tel: (803) 929-3000
James.Leventis@usdoj.gov